

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.*  
Case No. 18-op-45090

*The County of Cuyahoga, et al. v. Purdue  
Pharma L.P., et al.*  
Case No. 17-op-45004

MDL No. 2804

Hon. Dan Aaron Polster

**DECLARATION OF ASHLEY W. HARDIN  
IN SUPPORT OF DEFENDANTS' MOTION TO EXCLUDE EXPERT TESTIMONY OF  
KATHERINE KEYES, ANNA LEMBKE & JONATHAN GRUBER  
RE THE "GATEWAY HYPOTHESIS" OF CAUSATION**

I, Ashley W. Hardin, declare as follows:

1. I am an attorney at Williams & Connolly LLP, counsel for Defendant Cardinal Health, Inc. in the above-captioned case.
2. I submit this declaration in support of Defendants' Motion To Exclude Expert Testimony of Katherine Keyes, Anna Lembke & Jonathan Gruber Re: the "Gateway Hypothesis" of Causation.
3. Attached as **Exhibit 1** is a true and correct copy of the 2016 Cuyahoga County Opiate Task Force Report, CUYAH\_014194735.
4. Attached as **Exhibit 2** is a true and correct copy of excerpts from the transcript of the deposition of Anna Lembke, conducted on April 24, 2019.

5. Attached as **Exhibit 3** is a true and correct copy of excerpts from the transcript of the deposition of Jonathan Gruber, conducted on April 25, 2019.

6. Attached as **Exhibit 4** is a true and correct copy of an article, marked as Exhibit 10 to the deposition of Dr. Thomas Gilson: Thomas Gilson et al., *The Cuyahoga County Heroin Epidemic*, American Forensic Pathology (Mar. 1, 2014).

7. Attached as **Exhibit 5** is a true and correct copy of an excerpt from the transcript of the deposition of Deborah Forkas, conducted on January 23, 2019.

8. Attached as **Exhibit 6** is a true and correct copy of an article, marked as Exhibit 11 to the deposition of Dr. Katherine Keyes: Wilson M. Compton et al., *Relationship between Nonmedical Prescription-Opioid Use and Heroin Use*, N. Engl. J. Med., 374, 156–57 (2016).

9. Attached as **Exhibit 7** is a true and correct copy of the May 10, 2019 Expert Report of Catherine Rahilly-Tierney M.D., M.P.H..

10. Attached as **Exhibit 8** is a true and correct copy of the May 10, 2019 Expert Report of Rob Lyerla, PhD MGIS.

11. Attached as **Exhibit 9** is a true and correct copy of excerpts from the transcript of the deposition of Katherine Keyes, conducted on April 29, 2019.

Dated: June 28, 2019

Respectfully submitted,

/s/ Ashley W. Hardin  
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**CERTIFICATE OF SERVICE**

I, Ashley W. Hardin, hereby certify that the foregoing document was served on all counsel of record via the Court's ECF system.

/s/ Ashley W. Hardin  
Ashley W. Hardin